

**DOCKET NUMBER 116-1**

## Attorneys for Petitioning Creditors

In Re:

Case No. 05-05926-PBINV

## Involuntary Chapter 7

**REPLY DECLARATION OF L. SCOTT  
KEEHN IN SUPPORT OF MOTION FOR  
AN ENFORCEMENT ORDER IMPOSING  
MONETARY SANCTIONS AGAINST THE  
DEBTOR**

**[BIFURCATED PHASE II]**

Date: November 19, 2007

Time: 2:00 p.m.

Judge: The Honorable Peter W. Bowie

Ctrm: 4

I, L. Scott Keehn, declare:

1. I am an attorney at law, duly licenced to practice before all courts of this State, and before the United States District Court for the Southern District of California. I am a shareholder of the firm Keehn & Associates APC, attorneys of record for Petitioning Creditors. I have personal knowledge of the factual matters stated herein.

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2. At no time did Mr. Lopez, or anyone acting on his behalf, make any indication to me that there would be dates on which the deposition would be more convenient and cost-effective for Mr. Lopez because he would have “other important matters to attend to in California”<sup>1</sup> in addition to his deposition. Nor did anyone ever request that our office schedule his deposition to be in conjunction with such occasions.

3. Had Mr. Lopez or his counsel requested that our office schedule Mr. Lopez’s deposition to coincide with a time when he had other matters to attend to in California, I would have made every reasonable effort to comply with such a request.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this Declaration was executed this 13th day of November, 2007, at San Diego, California.

//s// L. Scott Keehn  
L. Scott Keehn

KEEHN & ASSOCIATES, APC  
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<sup>1</sup> See, “Opposition of Alleged Debtor to Motion for Sanctions; Declaration of Francis J. Lopez in Support Thereof”, Docket Item No. 115, Page 4, Line 4.